



April 8, 2021

Hon. Analisa Torres  
U.S. District Judge, Southern District of New York  
500 Pearl Street  
New York, New York 10007  
**VIA ECF**

Re: *Arlene Delgado v. Donald J. Trump for President, Inc., et. al.*, No. 1:19-cv-11764-AT

Dear Judge Torres:

This firm represents the above-referenced Plaintiff. We write, with Defendants' consent, to respectfully request a one-week extension of the deadlines imposed in the Court's March 26, 2021 Order (Dkt. 63). There have been no prior requests for this relief.

We make this request because lead counsel Abraham Melamed was out of the office from March 26, 2021 through April 6, 2021 in observance of Passover, and having an additional week will ensure we are able to properly amend the complaint and brief a motion for a permanent injunction. If granted, the new schedule would be:

1. Plaintiff shall file an amended complaint by April 16, 2021;
2. Defendants shall file their supplemental motion to compel and Plaintiff shall file her motion for a permanent injunction by April 23, 2021;
3. The parties shall file their opposition papers by May 6, 2021; and
4. The parties shall file any replies by May 14, 2021.

We thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/ Abe Melamed

**DEREK SMITH LAW GROUP, PLLC**  
ABRAHAM Z. MELAMED (AM1520)  
One Penn Plaza, Suite 4905  
New York, New York 10119  
[Abe@dereksmithlaw.com](mailto:Abe@dereksmithlaw.com)  
Phone: (212) 587-0760

cc: All Counsel (via ECF)

Los Angeles Office: 633 West 5th Street, Suite 3250, Los Angeles, CA 90071 | (310) 602-6050

New York City Office: One Penn Plaza, Suite 4905, New York, NY 10119 | (212) 587-0760

Philadelphia Office: 1845 Walnut Street, Suite 1600, Philadelphia, PA 19103 | (215) 391-4790

Miami Office: 701 Brickell Ave., Suite 1310, Miami, FL 33131

New Jersey Office: 73 Forest Lake Drive, West Milford, NJ 07421 | (973) 388-8625

Website: [www.discriminationandsexualharassmentlawyers.com](http://www.discriminationandsexualharassmentlawyers.com)